

UNITED STATES DISTRICT COURT
SOUTHER DISTRICT OF NEW YORK

OSVALDO DE LA ROSA
Plaintiff

v.

JOHNN E. POTTER; et als
Defendant

7:07 Civ. 10704 (CLB) (GAY)

MOTION FOR CONTINUANCE

TO THE HONORABLE COURT:

Plaintiff, through its undersigned counsel, very respectfully states and requests:

1. The undersigned counsel made an appearance, *pro hac vice*, that was approved by this Court. We immediately requested from defendants counsel consent to ask the Court for a continuance of the July 17, 2008 telephone conference.

2. The grounds for such continuance are as follows: Prior to our appearance in this case we had requested and had confirmed our attending a unique continuing legal education seminar sponsored by the United States District Court for the District of Puerto Rico. The conference would take place on July 17 and 18, 2008. See Ex. Nos. 1 & 2. Continued presence at the seminar is a requirement and if we would participate in court telephone conference we would miss an important professional development opportunity.

3. We proposed to brother counsel Li Yu, to jointly ask for the continuance on the dates we would take deposition of the United States Postal Service in White Plains. The proposed dates for the continuance are thus, July 24 and 25. Brother Counsel Yu welcomed our presence in New York and even proposed that the conference be held in chambers, if preferred by the Court.

WHEREFORE it is respectfully requested that this Court grant this motion, and allow the continuance of the telephone conference on July 24 or 25, if needed in chambers.

RESPECTFULLY SUBMITTED.

At San Juan Puerto Rico July 10, 2008.

s/: Edelmiro Salas Gonzalez
EDELMIRO SALAS GONZÁLEZ
Pro hac vice counsel for Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that on this date I filed the foregoing motion, titled Motion for Continuance, using the Honorable Court's Electronic Case Filing system which will send notice to the counsel of record in the case of caption.

July 10, 2008

s/: Edelmiro Salas Gonzalez
EDELMIRO SALAS GONZÁLEZ
Pro hac vice counsel for Plaintiff
1072 Calle 17 Urb. Villa Nevarez
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Edelmiro Salas

From: Carmen_Serrano@prd.uscourts.gov
Sent: Wednesday, June 04, 2008 4:22 PM
Subject: July 17-18, 2008 Federal Jurisd., Evid & Ethics Seminar Reservation Confirmation
Follow Up Flag: Follow up
Flag Status: Red
Attachments: Notice 08-05 Sem July 17&18-08.pdf

This is to CONFIRM that you have a reserved seat to attend the Federal Jurisdiction, Evidence and Ethics Seminar, which will be held on July 17-18, 2008 at the Caribe Hilton Hotel, San Cristóbal Ballroom, at 1 San Geronimo Street, San Juan, Puerto Rico.

You must attend the entire period of instruction on July 17 and 18 to receive Continuing Legal Education (CLE) credit. No CLE credit will be given if you are absent from any portion of the seminar. If you are unable to meet this requirement, you must send your cancellation notice by e-mail to Carmen Serrano at: Carmen_Serrano@prd.uscourts.gov, no later than July 7, 2008 with your full name, bar number and telephone number. Confirmed seats are non-transferable. Any attorney with a reserved space who fails to attend will be required to explain the absence to the Court, in writing.

Attendees will cover their own parking expenses. The hotel charges \$30.00 for valet parking and \$15.00 self-parking fee for a period of 6 to 8 hours a day. Please refer to Notice to Counsel 08-05 for additional information.

Cordially,

Carmen I. Serrano
Administrative Assistant to the Chief Deputy Clerk
U.S. District Court for Puerto Rico
Carmen_Serrano@prd.uscourts.gov

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO



NOTICE TO COUNSEL
NO. 08-05

SEMINAR ON FEDERAL JURISDICTION, EVIDENCE AND ETHICS
JULY 17-18, 2008

The United States District Court for the District of Puerto Rico is sponsoring a two-day Continuing Legal Education Seminar on Federal Jurisdiction, Evidence Law and Ethics, to be held on **Thursday and Friday, July 17 and 18, 2008**, at the Caribe Hilton Hotel, San Juan, Puerto Rico. This is an extraordinary continuing legal education opportunity for both novice and seasoned practitioners at no charge. This program is open to all attorneys admitted to practice before the U.S. District Court for the District of Puerto Rico, and are in good standing. Every effort will be made to obtain CLE credit hours from the Puerto Rico Supreme Court's Continued Legal Education Program.

On July 17, the seminar will be offered from 8:30 a.m. to 4:30 p.m., and on July 18, from 8:00 a.m. to 5:00 p.m. The program includes lunch, snacks and refreshments both days.

Professor James Pfander from Northwestern University School of Law, Professor David Faigman from University of California, Hastings College of the Law and Jack Marshall from ProEthics, Ltd., all reputed scholars, will be the featured speakers.

Professor James Pfander, a graduate of the University of Virginia, School of Law and the University of Missouri, has focused his teaching and research on federal jurisdiction and procedure. He currently lectures on Civil Procedure at Northwestern University and previously taught at the University of Illinois College of Law. He also serves as reporter/consultant to the Federal-State Jurisdiction Committee of the Judicial Conference of the United States. Professor Pfander will lecture on a variety of topics within the realm of federal jurisdiction.

Professor David Faigman is a graduate of the University of Virginia and the State University of New York, College at Oswego. He lectures on Constitutional Law, Scientific Methods for Lawyers, and teaches a Seminar on Science in the Law. Professor Faigman has

Notice to Counsel No. 08-05

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published extensively on the use of science in the law. He is the coauthor of a four-volume treatise, Modern-Scientific Evidence: The Law and Science of Expert Testimony (2005), published by Thompson/West Publishing Company. Professor Faigman will lecture on Daubert v. Merrell Dow Pharmaceuticals and progeny.

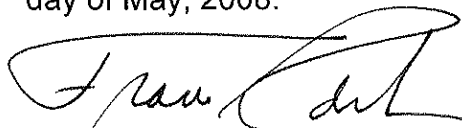
Professor Jack Marshall, a graduate from Georgetown University Law Center and Harvard College, is the president and founder of ProEthics, Ltd., a professional ethics training and consulting firm. He is also an adjunct professor of legal ethics at the American University School of Law. Professor Marshall will lecture on ethics.

Spaces are limited to 250 seats and reservations will be taken on a first-come first-served basis. For reservations please send your request **only** by email to the U.S. District Court Federal Bar electronic mail address at prdbar@prd.uscourts.gov. **The e-mail request must include the attorney's full name, USDC Bar number, current mailing address and telephone number.** The reservations' deadline is June 25, 2008 or until all seats have been reserved, whichever comes first. Cancellations must be made on or before July 7, 2008. **Registrations may only be made via email. No telephone calls will be accepted.** Each attorney will do his/her own reservations. Reservations done by other persons on behalf of third party attorneys WILL NOT be honored. Only attorneys in good standing will be allowed to register. To verify good standing status please contact Mr. Neil Almeida, Financial Specialist at 787-772-3061.

The Court restricts participation to those attorneys who commit themselves to full participation during the whole program (both days). Any attorney with a confirmed seat who fails to attend any of the sessions will be required to explain in writing to the Court the reason(s) for his/her absence. The Office of the Clerk will issue confirmation notices to the attorneys' email address in CM/ECF shortly after the registration period expires. Only attorneys with confirmed seats may attend the seminar. Confirmation of seats is non-transferable.

BY ORDER OF THE COURT.

In San Juan, Puerto Rico, this 8th day of May, 2008.


FRANCES RIOS DE MORAN, ESQ.
CLERK OF COURT